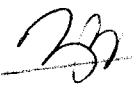


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
2018 JUL 11 PM 1:54
DEPUTY CLERK 

UNITED STATES OF AMERICA

v.

No. 5:18-CR-050-C
(Supersedes indictment filed 6/13/18)

JOSE GARCIA-LIZANAGA (1)
a/k/a "Chepe"
JORGE LIZARRAGA-TIRADO (2)
a/k/a "Luis" or "Barba"
ANTONIO ALVAREZ, JR. (3)
a/k/a "Tony"
EDUARDO AGUSTIN CRUZ (4)
a/k/a "Lalo"
ROBERT LEE MELENDEZ (5)
a/k/a "Roberto"
JESUS MARCUS FRANCO (6)
a/k/a "Jesse"
JUANA SANCHEZ (7)
a/k/a "Juana Salazar" or "Jaime"
RICHARD DAVID HUPPER (8)
a/k/a "Piraton"
ANDREW DOYAL PUGH (9)
GREGORY HOLLEMAN (10)
a/k/a "G"
SAUL CHAVIRA-MOLINA (11)
JERMAINE EDGAR GARMON (12)
SHAD EVERETT EVANS (13)
ARTURO SANCHEZ (14)
PETRA MARIA SAUCEDA-PEREZ (16)
a/k/a "Aunt" or "Tia"
KIM HERRERA (17)
JESSICA ANGEL DELEON (18)
BRODERICK BRADLEY (19)
AMBROSIO GARCIA, JR. (20)
a/k/a "Bocho"
AMBROSIO
GARCIA-RODRIGUEZ, SR. (21)
ALEJANDRO CASTILLO (22)
a/k/a "Alex"
PAUL LARUE BRADLEY (23)

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances
(Violation of 21 U.S.C. § 846)

From on or about a date unknown to the grand jury and continuing through on or about the date of this indictment, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, **Eduardo Agustin Cruz**, also known as “Lalo”, **Robert Lee Melendez**, also known as “Roberto”, **Jesus Marcus Franco**, also known as “Jesse”, **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, **Richard David Hupper**, also known as “Piraton”, **Andrew Doyal Pugh**, **Gregory Holleman**, also known as “G”, **Saul Chavira-Molina**, **Jermaine Edgar Garmon**, **Shad Everett Evans**, **Arturo Sanchez**, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, **Kim Herrera**, **Jessica Angel Deleon**, **Broderick Bradley**, **Ambrosio Garcia, Jr.**, also known as “Bocho”, **Ambrosio Garcia-Rodriguez, Sr.**, **Alejandro Castillo**, also known as “Alex”, and **Paul Larue Bradley**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with persons known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine and methamphetamine, both Schedule II controlled substances, and marihuana, a Schedule I controlled substance, in violation of Title 21, United States

Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

Cocaine

With respect to defendants **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, **Robert Lee Melendez**, also known as “Roberto”, and **Jesus Marcus Franco**, also known as “Jesse”, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is five kilograms and more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii).

With respect to defendants **Eduardo Agustin Cruz**, also known as “Lalo”, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, **Kim Herrera**, **Jessica Angel Deleon**, **Ambrosio Garcia, Jr.** also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more, but less than five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii).

With respect to defendants **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, **Gregory Holleman**, also known as “G”, **Saul Chavira-Molina**, **Jermaine Edgar Garmon**, **Shad Everett Evans**, **Arturo Sanchez**, **Broderick Bradley**,

Alejandro Castillo, also known as “Alex”, and **Paul Larue Bradley**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(b)(1)(C).

Methamphetamine

With respect to defendants **Jose Garcia-Lizanaga**, also known as “Chepe”, **Richard David Hupper**, also known as “Piraton”, and **Andrew Doyal Pugh**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

Marihuana

With respect to defendants **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Jesus Marcus Franco**, also known as “Jesse”, **Ambrosio Garcia, Jr.**, also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(D).

All in violation of Title 21, United States Code, Section 846.

Count Two

Distribution and Possession with Intent to Distribute
500 Grams or More of Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii))

On or about June 10, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Ambrosio Garcia, Jr.**, also known as “Bocho”, and **Ambrosio Garcia-Rodriguez, Sr.**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more, but less than five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Distribution and Possession with Intent to Distribute
500 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about June 6, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Richard David Hupper**, also known as “Piraton”, and **Andrew Doyal Pugh**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Four

Distribution and Possession with Intent to Distribute Marihuana
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D))

On or about May 4, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Robert Lee Melendez**, also known as “Roberto”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

Count Five

Unlawful Use of a Communications Facility
(Violation of 21 U.S.C. § 843(b))

On or about April 30, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, and **Robert Lee Melendez**, also known as “Roberto”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Six

Unlawful Use of a Communications Facility
(Violation of 21 U.S.C. § 843(b))

On or about April 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, and **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Seven

Distribution and Possession with Intent to Distribute
500 Grams or More of Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(ii))

On or about April 16, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, and **Jessica Angel Deleon**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more, but less than five kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eight

Unlawful Use of a Communications Facility
(Violation of 21 U.S.C. § 843(b))

On or about April 15, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, and **Jesus Marcus Franco**, also known as “Jesse”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Nine

Distribution and Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 10, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, and **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, defendants, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Ten
Bulk Cash Smuggling
(Violation of 31 U.S.C. § 5332(a))

On or about April 7, 2018, in the Lubbock Division of the Northern District of Texas, the Western District of Texas, and elsewhere, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, defendant, did, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, knowingly conceal more than \$10,000 in currency and other monetary instruments, on the defendant’s person and in a conveyance, article of luggage, merchandise, and other container, and transported and transferred, and attempted to transport and transfer, such currency and monetary instruments from a place within the United States to a place outside of the United States.

In violation of Title 31, United States Code, Section 5332(a), and Title 18, United States Code, Section 2.

Count Eleven

Unlawful Use of a Communications Facility
(Violation of 21 U.S.C. § 843(b))

On or about April 6, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Eduardo Agustin Cruz**, also known as “Lalo”, and **Jesus Marcus Franco**, also known as “Jesse”, defendants, did intentionally and knowingly use a communications facility, to wit: cellular telephones, in facilitating the commission of Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Twelve

Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Saul Chavira-Molina**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Thirteen

Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 19, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Arturo Sanchez**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Fourteen

Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 16, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Gregory Holleman**, also known as “G”, and **Jermaine Edgar Garmon**, defendants, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Fifteen

Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 16, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Shad Everett Evans**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Sixteen

Distribution and Possession with Intent to Distribute
28 Grams or More of Cocaine Base
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii))

On or about February 9, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Broderick Bradley**, defendant, did intentionally and knowingly distribute and possess with intent to distribute 28 grams and more, but less than 280 grams, of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii).

Count Seventeen

Distribution and Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about January 29, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Broderick Bradley**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Eighteen

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about June 6, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Andrew Doyal Pugh**, defendant, did knowingly possess a firearm, to wit: a Taurus, .45 caliber revolver, serial number BU667666, in furtherance of a drug trafficking crime, that is, Possession with Intent to Distribute 500 Grams or More of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), as charged in count three of this indictment, an offense for which he may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2.

Count Nineteen

Distribution and Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about June 14, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Eduardo Agustin Cruz**, also known as “Lalo”, and **Alejandro Castillo**, also known as “Alex”, defendants, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about June 14, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Alejandro Castillo**, also known as “Alex”, defendant, did knowingly possess a firearm, to wit: a Springfield, model XDS, 9mm pistol, serial number S3734126, in furtherance of a drug trafficking crime, that is, Distribution and Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), as charged in count nineteen of this indictment, an offense for which he may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2.

Count Twenty-One

Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about June 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Paul Larue Bradley**, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Twenty-Two

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about June 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Broderick Bradley**, defendant, did knowingly possess a firearm, to wit: a Springfield, model XD, .45 caliber pistol, serial number XS631648, in furtherance of a drug trafficking crime, that is, Conspiracy to Distribute and Possess with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 846, as charged in count one of this indictment, an offense for which he may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2.

Count Twenty-Three

Possession with Intent to Distribute Cocaine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about June 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jesus Marcus Franco**, also known as “Jesse”, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Count Twenty-Four

Possession of Firearms in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about June 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jesus Marcus Franco**, also known as “Jesse”, defendant, did knowingly possess firearms, to wit: a Smith and Wesson, 9mm pistol, serial number FWF2835; a Mossberg, 12-gauge shotgun, serial number T180452; and a Mossberg, 12-gauge shotgun, serial number V0231512, in furtherance of a drug trafficking crime, that is, Possession with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), as charged in count twenty-three of this indictment, an offense for which he may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2.

Count Twenty-Five

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about June 21, 2018, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, defendant, did knowingly possess a firearm, to wit: a Smith and Wesson, model M&P, 9mm pistol, serial number HTM7141, in furtherance of a drug trafficking crime, that is, Conspiracy to Distribute and Possess with Intent to Distribute Cocaine, in violation of Title 21, United States Code, Section 846, as charged in count one of this indictment, an offense for which he may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2.

Forfeiture Notice

(21 U.S.C. § 853(a) and 21 U.S.C. § 853(p))

Upon conviction of any offense charging a violation of United States Code, Title 21, and pursuant to 21 U.S.C. § 853(a), defendants, **Jose Garcia-Lizanaga**, also known as “Chepe”, **Jorge Lizarraga-Tirado**, also known as “Luis” or “Barba”, **Antonio Alvarez, Jr.**, also known as “Tony”, **Eduardo Agustin Cruz**, also known as “Lalo”, **Robert Lee Melendez**, also known as “Roberto”, **Jesus Marcus Franco**, also known as “Jesse”, **Juana Sanchez**, also known as “Juana Salazar” or “Jaime”, **Richard David Hupper**, also known as “Piraton”, **Andrew Doyal Pugh**, **Gregory Holleman**, also known as “G”, **Saul Chavira-Molina**, **Jermaine Edgar Garmon**, **Shad Everett Evans**, **Arturo Sanchez**, **Petra Maria Saucedo-Perez**, also known as “Aunt” or “Tia”, **Kim Herrera**, **Jessica Angel Deleon**, **Broderick Bradley**, **Ambrosio Garcia, Jr.**, also known as “Bocho”, **Ambrosio Garcia-Rodriguez, Sr.**, **Alejandro Castillo**, also known as “Alex”, and/or **Paul Larue Bradley**, defendants, shall forfeit to the United States of America any property constituting, or derived from, any proceeds the defendant(s) obtained, directly or indirectly, as a result of the offense(s), and any of the property used, or intended to be used, in any manner or part, by the defendant(s) to commit, or to facilitate the commission of the offense(s).

Pursuant to 21 U.S.C. § 853(p), if any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the forfeitable property described above.

A TRUE BILL:



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



SEAN M. LONG
Assistant United States Attorney
Texas State Bar No. 24056734
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

JOSE GARCIA-LIZANAGA (1)

a/k/a "Chepe"

JORGE LIZARRAGA-TIRADO (2)

a/k/a "Luis" or "Barba"

ANTONIO ALVAREZ, JR. (3)

a/k/a "Tony"

EDUARDO AGUSTIN CRUZ (4)

a/k/a "Lalo"

ROBERT LEE MELENDEZ (5)

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JESUS MARCUS FRANCO (6)

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JUANA SANCHEZ (7)

a/k/a "Juana Salazar" or "Jaime"

RICHARD DAVID HUPPER (8)

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ANDREW DOYAL PUGH (9)

GREGORY HOLLEMAN (10)

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SAUL CHAVIRA-MOLINA (11)

JERMAINE EDGAR GARMON (12)

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KIM HERRERA (17)

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BRODERICK BRADLEY (19)

AMBROSIO GARCIA, JR. (20)

a/k/a "Bocho"

AMBROSIO GARCIA-RODRIGUEZ, SR. (21)

ALEJANDRO CASTILLO (22)

a/k/a "Alex"

PAUL LARUE BRADLEY (23)

INDICTMENT

- COUNT 1: CONSPIRACY TO DISTRIBUTE AND POSSESS
WITH INTENT TO DISTRIBUTE CONTROLLED
SUBSTANCES
Title 21, United States Code, Section 846.
- COUNTS 2 and 7: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE 500 GRAMS OR MORE OF COCAINE
Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(B)(ii).
- COUNT 3: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE 500 GRAMS OR MORE OF
METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(A)(viii).
- COUNT 4: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE MARIHUANA
Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(D).
- COUNTS 5, 6, 8, and 11: UNLAWFUL USE OF A COMMUNICATIONS FACILITY
Title 21, United States Code, Section 843(b).
- COUNTS 9 and 17: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE COCAINE
Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(C).
- COUNT 10: BULK CASH SMUGGLING
Title 31, United States Code, Section 5332(a).
- COUNTS 12-15, 19, 21,
and 23: POSSESSION WITH INTENT TO DISTRIBUTE
COCAINE
Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(C).
- COUNT 16: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE 28 GRAMS OR MORE OF COCAINE BASE
Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(B)(iii).
- COUNTS 18, 20, 22, 24,
and 25: POSSESSION OF A FIREARM(S) IN FURTHERANCE OF
A DRUG TRAFFICKING CRIME
Title 18, United States Code, Section 924(c).

FORFEITURE NOTICE

(25 COUNTS + FORFEITURE NOTICE)

A true bill rendered:

Lubbock

Foreperson

Filed in open court this

11th


day of

July

A.D. 2018.

ARREST WARRANT TO ISSUE ONLY AS TO:

Paul Larue Bradley



UNITED STATES MAGISTRATE JUDGE